

Narrabri Gas Project CCC

Tabled: December 2014
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Organisation: People for the Plains
Questions submitted by: Tony Pickard

To NSW Office of Water, Environment Protection Agency and NSW Office of Coal Seam Gas and Santos

Question 1

Request 1: Santos' Referral to the EBPC (EPBC Referral 2014/7376) by EcoLogical 2014 states on Page 65:

"Compared with the assessment conducted in accordance with the Significant Impact Guidelines for the Exploration and Appraisal program, an assessment of the project (the Narrabri Gas Project) indicates that the duration and wider geographic extent of depressurisation of groundwater head within the coal seams and adjacent strata will cause a significant impact to the groundwater resources of the Gunnedah/Oxley Basin..."

I have been instructed by local Narrabri residents to request the following information and to pass on the information to the Community:

- a). The Significant Impact Guidelines for Exploration and Appraisal as issued by the Office of Coal Seam Gas or any other Government Agency or Department that are issued to the Non-Conventional Coal Seam/Shale Gas and/or Conventional Gas Companies for their Review of Environmental Factors that accompany the Exploration Activity Applications
- b). Any documentation that NSW Government Agencies, Departments or Santos may have regarding the studies and modelling done to arrive at the conclusion that the Narrabri Gas Project will cause a "significant impact" to the groundwater resources of the Gunnedah/Oxley Basin.

Santos Response

- The Significant Impact Guidelines are not issued by the NSW Office of Coal Seam Gas, they are detailed within the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*.
- Matters of National Environmental Significance (MNES) Water Trigger Guidelines provide the details and classification criteria that Santos followed. Further information is available from <http://www.environment.gov.au/epbc/what-is-protected/water-resources>
- More information on what amounts to a significant impact - *Significant Impact Guidelines 1.1: Matters of National Environmental Significance* is available from <http://www.environment.gov.au/epbc/publications/significant-impact-guidelines-11-matters-national-environmental-significance>

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- More information on the definitions of CSG and large coal mining developments - *Significant Impact Guidelines 1.3: Coal seam gas and large coal mining developments - impacts on water resources* is available from <http://www.environment.gov.au/resource/significant-impact-guidelines-13-coal-seam-gas-and-large-coal-mining-developments-impacts>
- A copy of the report titled *Coal seam gas extraction: modelling groundwater impacts* which was commissioned by the Department of the Environment on the advice of the Interim Independent Expert Scientific Committee on Coal Seam Gas and Coal Mining prepared by the Coffey Geotechnics and revised by the Department of the Environment following peer review was published in September 2014 is available from <http://www.environment.gov.au/water/publications/csg-extraction-modelling-groundwater-impacts>
- A copy of the Australian Government Fact Sheet titled *Fact Sheet 4: EPBC Act Amendments – Water Trigger* is available from <http://www.environment.gov.au/system/files/resources/dcdda2d3-88e8-4b5e-8b6d-e8fee3af4d6b/files/fact-sheet-4-epbc-act-amendments-water-trigger.pdf>

Question 2

Request 2: Santos has stated in a press release dated 31st October 2014 which was found on their website that,

"Rehabilitation sites in and around the Pilliga. This rehabilitation program is complete and was conducted with oversight by the Office of Coal Seam Gas."

I request any documentation regarding the final approval and full description of work completed as per the above statement on the rehabilitation program.

Santos Response

- The rehabilitation program was not subject to a regulatory approval process, rather a rehabilitation plan was submitted to the OCSG and NSW Forestry which detailed the rehabilitation program.
- For further detail, please refer to the following link: <http://www.santos.com/our-activities/eastern-australia/new-south-wales/environment/pilliga-rehabilitation.aspx>

Question 3

Request 3: I request documentation on the Tintfield Pond leakage, including Santos documents, EPA documents and any documents held by the NSW Office of Coal Seam Gas, EPA, NSW Office of Water or any other NSW Government Department or Agency, appertaining to the cause of the leak, the extent and direction of the ponded produced water leak, the effect upon the natural occurring elements and minerals in the area and the effect upon water quality of the area. I would also request any peer review documents or internal government reports appertaining to this issue by either Santos or the relevant NSW Government Departments/Agencies.

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Santos Response

- There was an inferred leak at Pond 2 Tintfield in May 2014.
- The EPA released a statement in August 2014 in relation to this matter that in part stated that “slightly elevated concentrations of metals, including uranium, were also detected. The source of most of the elevated metals (including uranium) is from naturally occurring soils on site”. A copy of the EPA statement can be accessed at <http://www.epa.nsw.gov.au/resources/licensing/140634tintfieldponds.pdf>
- It was later confirmed after emptying the pond and an integrity assessment being undertaken that there was no breach of the liner and the saline groundwater was of natural origin and not from produced water within the pond.

Question 4

Request 4: A copy of the EPA Audit of the Santos CSG Operations called “*Report into CSG Operations at Gunnedah and Pilliga*”, as described in the Sydney Morning Herald dated 23rd November 2014.

Santos Response

- The report that is referred to in this question relates to a performance review undertaken by the EPA.
- Santos has not formally received a copy of the report, nor been asked to respond to findings of the performance review.
- Please refer to the EPA for response.